Mr. Phil McKittrick
Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360

Re: 091-11627-00079
First Administrative Amendment to
Part 70 091-7666-00079

Dear Mr. McKittrick:

Polyfoam Packers Corporation was issued a Part 70 permit 091-7666-00079 on October 14, 1999 for a stationary polystyrene shape molding operations.

A letter requesting an amendment to this Part 70 permit was received on December 8, 1999. The amendment letter requests the inclusion of molding press, Kohler model 609, which was originally in the Part 70 permit application but was inadvertently excluded when the permit was issued. This amendment application also requests the revision of Section A.2 of the issued Part 70 permit 091-7666-00079 to state thirty-one (31) foam polystyrene storage silos, to account for the proposed additional storage silos. No new potential to emit (PTE) will result from the inclusion of the molding press since the source's VOC usage stays the same. No PM emissions will result from the new storage silos. No new applicable requirements will be triggered from this change nor violate a permit term in the issued Part 70. Therefore, an administrative amendment will be issued. Revision to the Part 70 permit is as follows (changes are bolded and deletions are struck-through for emphasis):

On page 5 of 37 of Section A.2, item 2) of the Part 70 permit is revised to incorporate the new storage silos:

2) ~~Twenty-four~~ **Thirty-one** (~~24~~ **31**) foam polystyrene storage silos with a total maximum storage capacity of ~~60,000~~ **76,000** pounds.

Item 24) will be added in Section A.2, page 6 of 37 of the Part 70 permit to include the molding press, Kohler model 609 as follows:

24) One (1) molding press, Kohler model 609, rated at 400 pounds per hour and exhausting to Stack S-10.

These two (2) above changes will also be reflected in Section D.2, facility description table.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for (Aida De Guzman) or extension (3-4972), or dial (317)233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD

cc: File -LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector- Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999
1st Administrative Amendment: 091-11627-00079	Affected Pages: 5, 6, 29, 30
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Mangement	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary polystyrene shape molding operations.

Responsible Official:	Phil McKittrick
Source Address:	955 Woodland Avenue, Michigan City, Indiana 46360
Mailing Address:	955 Woodland Avenue, Michigan City, Indiana 46360
SIC Code:	3086
County Location:	LaPorte
County Status:	Nonattainment for sulfur dioxide
Source Status:	Part 70 Permit Program Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1

2) Thirty-one (31) foam polystyrene storage silos with a total maximum storage capacity of 76,000 pounds.

3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, Kohler model 609, rated at 400 pounds per hour and exhausting to Stack S-10.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Thirty-one (31) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 76,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, Kohler model 609, rated at 400 pounds per hour, and exhausting to Stack S-10.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall
continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

1. The molding compound shall contain a maximum average of 5.5% pentane.
2. Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.
3. The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.